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June 10, 2008

Via ECF

Hon. Peter G. Sheridan
United State District Judge
District Court of New Jersey
30 Walnut Street
Newark, New Jersey 07102

Re: U.S.A. v. Joseph Foglia
Case No.: 06CR807

Your Honor:

Our firm represents Joseph Foglia in the above-referenced matter. The sentencing is scheduled before Your Honor on July 7, 2008 at 9:30am.

I am writing to request an adjournment to September 9, 2008 from the present sentencing date. I have spoken to AUSA Christopher Kelly and he has consented to this request.

I request this adjournment for several reasons. First of all, Mr. Foglia has just been interviewed by the probation department today. In addition, we are still in the process of working out the final tax returns and want to make sure that everything is correct and completed prior to sentencing. Also, there is much additional information that needs to be supplied to the probation department concerning our agreement with the government and additional personal information from Mr. Foglia's family. This additional information should be made a part of the report.

I apologize to the court for the delay and barring a major problem will not request a further adjournment beyond September 9, 2008.

Thank you for your consideration.

Respectfully,

Paul A. Goldberger
Paul A. Goldberger

Cc: AUSA Christopher J. Kelly
United States Attorney's Office
970 Broad Street, Suite 700
Newark, NJ 07102

Senior Probation Officer Thomas Leakin
United States Probation Office
402 East State Street
Trenton, NJ 09608-1506

*Sentencing shall be
Sept. 13, 2008 at 10 AM
As Ordered
Peter G. Sheridan*